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18 *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

20 ABEL CANTARO CASTILLO; ALCIDES INGA
21 RAMOS, and those similarly situated,

22 Plaintiffs,

23 vs.

24 WESTERN RANGE ASSOCIATION; MELCHOR
GRAGIRENA; EL TEJON SHEEP COMPANY;
25 MOUNTAIN PLAINS AGRICULTURAL
SERVICE; ESTILL RANCHES, LLC; and JOHN
26 ESTILL,

Defendants.

CASE NO. 3:16-cv-00237-RCJ-VPC

**Unopposed Motion for Extension of Time
to Object to Bills of Cost and for Leave to
File a Unified Objection**

1 After the Court's order dismissing Plaintiffs' claims, Defendants filed three bills of cost and
2 Plaintiffs' objections are currently due on March 12, 2018 and March 13, 2018. *See* Docs. 142, 143,
3 144. Plaintiffs request leave to file a single unified objection to all three bills of cost and for an
4 extension until March 19, 2018 to file the unified objection. This is the first motion to extend time to
5 object to the bills of cost.
6

7 Plaintiffs intend to object to the bills of cost, at least in part, based on their inability to pay.
8 *See Stanley v. University of Southern California*, 178 F. 3d 1069, 1079 (9th Cir. 1999). Because
9 some Plaintiffs currently reside in remote areas of Peru, Plaintiffs need the extra time to supply their
10 attorneys with evidence of that inability to pay for submission to the Court. Plaintiffs additionally
11 request that they be permitted to file a unified objection because arguments regarding ability to pay
12 will be the same or similar across all objections and a unified objection will therefore be more
13 efficient for the Court to consider. Prior to filing, Plaintiffs conferred with all Defendants regarding
14 this Motion. **Defendants do not oppose this Motion.**
15

16 Plaintiffs therefore request that:

- 17 1. Their deadline to respond to all of Defendants' bills of cost (Docs. 142, 143, 144) be
18 extended to March 19, 2018; and
- 19 2. They be granted leave to file a single unified response to Defendants' bills of cost
20 (Docs. 142, 143, 144).
21

22 Dated this 7th day of March, 2018

23 /s/Alexander Hood
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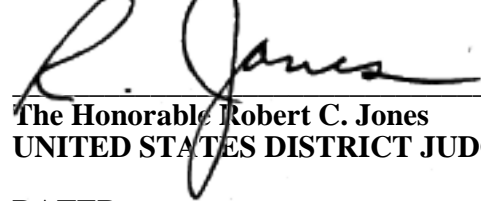
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24 *Attorneys for Plaintiffs*

25 **IT IS SO ORDERED:**

26 

27 The Honorable Robert C. Jones
28 UNITED STATES DISTRICT JUDGE

DATED: — March 9, 2018